

Serial No. 09/593,891  
Docket No. NEC DP-624  
Amendment D under Rule 116

particularly, the Examiner claims that Rostoker's element 108 is a bonding pad that connects the upper chip 102 to the lower substrate 110. However, element 108 is a conductive bump contact and element 104 is the bonding pad (Rostoker, col. 5 lines 52-55). Bonding pad 104 clearly connects the upper chip 102 to the lower substrate 110 through the wire 106. Bonding pad 104 is on the top side of the upper chip and does not face the lower substrate as required by claim 1 (col. 5 lines 55-56). Thus, no combination of Warren, Bruce et al. and Rostoker could render obvious Applicant's claim 1.

Moreover, it is submitted there is nothing contained within Warren, Bruce et al. and Rostoker that would suggest to one skilled in the art to combine their teachings in the manner suggested by the Examiner. In the primary reference Warren, substrate 14, which Warren describes as a "high density multichip inter-connect decal" is attached to a top surface of the integrated circuit 12 using an epoxy adhesive (col. 2, lines 48-50). While in Rostoker, the upper die is mounted to the substrate 10 via bond pads 104 disposed on the lower side of die 102. Thus, there is a basic difference between the manner in which the dies are mounted in the primary reference Warren, and the new secondary reference Rostoker, and it is submitted that there would be no motivation to one skilled in the art to combine the teachings of the references in the manner suggested by the Examiner, to achieve the invention as defined by claim 1.

Claims 2-8 depend directly or indirectly on claim 1, and are allowable for the same reasons as stated above, as well as for their own additional limitations.

It is believed, therefore, the Application now is in order for allowance. Early and favorable action are respectfully requested.

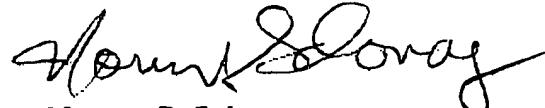
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Respectfully submitted,



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